



Peter Sahasrabudhe
Associate
Direct Dial: 716.848.1508
Direct Facsimile: 716.849.0349
PSahasra@hodgsonruss.com

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Via ECF

Hon. Christina Reiss
United District Court of Vermont
P.O. Box 446
Burlington, VT 05402-0446

Dear Judge Reiss:

Re: *Black Love Resists in the Rust, et al. v. City of Buffalo, et al.*
Civil No. 18-cv-00719-CCR

Our office represents the defendants in this matter. We are writing in connection with the plaintiffs' pending motion to take an additional eleven depositions (Dkt. No. 148). As stated in the plaintiffs' application, the defendants oppose this relief. The Court has not set a briefing schedule for the plaintiffs' motion and, as such, the defendants' deadline to serve opposition papers would have passed if the briefing schedule is governed by the Federal and Local Rules of Civil Procedure. As such, we are requesting that the Court extend the defendants' deadline to submit opposition papers *nunc pro tunc*.

Given recent weather events in Buffalo, the attorneys staffed on this matter were unable to return to the office in the week following service of the plaintiffs' motion, and the default deadline to file opposition papers was inadvertently overlooked. Furthermore, I have had a trial venued in Sullivan County, New York which just concluded yesterday. Upon returning from my trial and in reviewing the docket for this matter, it became apparent that the defendants would need to seek an extension of time to file our opposition papers. We are not seeking a large extension. In fact, we are only requesting a deadline that falls one week from today, January 17, 2023. We respectfully submit that this brief extension is warranted under the circumstances.

We thank the Court in advance for its consideration of our request.

Respectfully submitted,

s/ Peter Sahasrabudhe

Peter Sahasrabudhe

PAS/lml